

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONONDAGA

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CRAIG CURRIER,

Plaintiff,

-against-

ST. PETER ROMAN CATHOLIC PARISH CHURCH,
ST. MARY OF THE ASSUMPTION ROMAN
CATHOLIC PARISH CHURCH,
BISHOP FRANCIS JAMES HARRISON,
THE ROMAN CATHOLIC DIOCESE OF SYRACUSE,
JOHN DOE and JANE DOE, RICHARD
ROE and JANE ROE, priests, clergy and administrators
whose names are unknown to the Plaintiff,

Defendants.
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Index No.

Date Purchased:

Plaintiff designates
ONONDAGA
County as the place of trial.


The basis of the venue is
Defendants' place of
business.

SUMMONS

To the above named Defendant(s)

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to
serve a copy of your answer, or, if the complaint is not served with this summons, to serve a
notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this
summons, exclusive of the day of service (or within 30 days after the service is complete if this
summons is not personally delivered to you within the State of New York); and in case of your
failure to appear or answer, judgment will be taken against you by default for the relief
demanded in the complaint.

Dated: New York, New York
October 14, 2019



MICHAEL G. DOWD
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Attorneys for Plaintiff

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONONDAGA

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CRAIG CURRIER,

Plaintiff,

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CATHOLIC PARISH CHURCH,
BISHOP FRANCIS JAMES HARRISON,
THE ROMAN CATHOLIC DIOCESE OF SYRACUSE,
JOHN DOE and JANE DOE, RICHARD
ROE and JANE ROE, priests, clergy and administrators
whose names are unknown to the Plaintiff,

VERIFIED COMPLAINT

Defendants.

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Plaintiff, CRAIG CURRIER, by his attorney, MICHAEL G. DOWD, complaining
of defendants, hereby alleges the following:

JURISDICTION AND VENUE

1. This action is timely commenced pursuant to the New York State Child
Victims Act, dated February 14, 2019, and CPLR § 214-g.

2. This Court has jurisdiction pursuant to CPLR § 301 as Defendants'
principal place of business is in New York and because much of the unlawful conduct
complained of herein occurred in New York.

3. Venue is proper pursuant to CPLR § 503 because Onondaga County is the
principal place of business of Defendants. In addition, many of the events giving rise to this
action occurred in Onondaga County.

AS AND FOR A FIRST CAUSE OF ACTION
(NEGLIGENT SUPERVISION)

4. The plaintiff, CRAIG CURRIER (herein "PLAINTIFF") was born on January 2, 1962. He is a resident of Orlando, Florida.

5. PLAINTIFF is a Roman Catholic and was a parishioner at defendants ST. PETER ROMAN CATHOLIC PARISH CHURCH and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, which are parishes in the defendant ROMAN CATHOLIC DIOCESE OF SYRACUSE.

6. PLAINTIFF was baptized, confirmed, attended mass and received his sacraments through the Roman Catholic Church.

7. Upon information and belief, at all times mentioned herein, the ROMAN CATHOLIC DIOCESE OF SYRACUSE was and is a not-for-profit religious corporation organized and existing under and by virtue of the laws of the State of New York. Its principal headquarters are located in Syracuse, New York, which is in Onondaga County.

8. Upon information and belief, the ROMAN CATHOLIC DIOCESE OF SYRACUSE has more than 200,000 enrolled parishioners.

9. Upon information and belief, defendant FRANCIS JAMES HARRISON was at all times mentioned herein as the Roman Catholic Bishop of the ROMAN CATHOLIC DIOCESE OF SYRACUSE.

10. Upon information and belief, FRANCIS JAMES HARRISON was at all times mentioned herein as the Chief Executive Officer of the ROMAN CATHOLIC DIOCESE OF SYRACUSE.

11. Upon information and belief, defendant FRANCIS JAMES HARRISON was the Chief Executive Officer of all parishes in the ROMAN CATHOLIC DIOCESE OF SYRACUSE and as part of said responsibilities assigned the priests to work in said parishes, including defendant.

12. Upon information and belief at all times mentioned herein, JOHN FRANCIS HARROLD was the pastor of ST. PETER ROMAN CATHOLIC PARISH CHURCH and/or ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, having been assigned and otherwise authorized to work there by defendant FRANCIS JAMES HARRISON.

13. Upon information and belief, ST. PETER ROMAN CATHOLIC PARISH CHURCH and/or ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH is a Roman Catholic parish church within the ROMAN CATHOLIC DIOCESE OF SYRACUSE.

14. Sometime after PLAINTIFF became a member of the parishes, JOHN FRANCIS HARROLD began a pattern of grooming PLAINTIFF for the purpose of sexually abusing him. This grooming included, but was not limited to, complimenting PLAINTIFF'S appearance and giving him special attention and praise, special privileges, as well as presents. JOHN FRANCIS HARROLD was a psychologist who used that position to meet children, including PLAINTIFF. PLAINTIFF was assigned to do therapy with JOHN FRANCIS HARROLD in or around 1977 through 1979. When JOHN FRANCIS HARROLD had PLAINTIFF isolated during therapy sessions, JOHN FRANCIS HARROLD used his position of authority to violate PLAINTIFF'S appropriate boundaries, including by ordering PLAINTIFF to

remove all of his clothing and then to allow JOHN FRANCIS HARROLD to photograph PLAINTIFF'S naked person. JOHN FRANCIS HARROLD engaged took these actions to groom PLAINTIFF for sexual abuse.

15. Shortly after JOHN FRANCIS HARROLD began isolating PLAINTIFF during therapy sessions, JOHN FRANCIS HARROLD began sexually abusing PLAINTIFF. The sexual abuse of PLAINTIFF included forced fondling of PLAINTIFF'S genitals, forced PLAINTIFF to participate in oral intercourse, and forced PLAINTIFF to be photographed during sexually explicit activities. Said abuse will be described further at trial. Said abuse occurred many places, including within the facilities and on the grounds of ST. PETER ROMAN CATHOLIC PARISH CHURCH and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH. Upon information and belief, said abuse occurred within Oneida County, New York.

16. Upon information and belief, sometime in or around December of 2018, THE ROMAN CATHOLIC DIOCESE OF SYRACUSE released a list of credibly accused sexual abusers who had served as priests within the diocese. JOHN FRANCIS HARROLD'S name was included on that list.

17. Upon information and belief, PLAINTIFF was trained by the ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and JOHN FRANCIS HARROLD that he should obey, trust and respect the ROMAN CATHOLIC DIOCESE OF SYRACUSE, BISHOP FRANCIS JAMES HARRISON and JOHN FRANCIS HARROLD.

18. Upon information and belief, PLAINTIFF was trained by the ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH and JOHN FRANCIS HARROLD to obey, trust and respect its priests like JOHN FRANCIS HARROLD.

19. Upon information and belief, PLAINTIFF was trained by the ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH and JOHN FRANCIS HARROLD to obey, trust and respect its parish employees in positions of authority.

20. Upon information and belief, at least since 1950 through the present, defendants ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH knew the risk of sexual abuse of minor parishioners by priests working in the ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, including FATHER JOHN FRANCIS HARROLD.

21. Upon information and belief, at all times mentioned herein, defendants ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION

ROMAN CATHOLIC PARISH CHURCH knew that minors molested in the Catholic Church would suffer psychological and emotional damages and injuries.

22. Upon information and belief, at the time of the acts alleged herein, FR. JOHN FRANCIS HARROLD was an employee of, and acting as an agent of the ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and the ROMAN CATHOLIC DIOCESE OF SYRACUSE.

23. Upon information and belief, at the time of the acts alleged herein, FRANCIS JAMES HARRISON was the executive in charge of the ROMAN CATHOLIC DIOCESE OF SYRACUSE and acting as an agent in the scope of his employment of the ROMAN CATHOLIC DIOCESE OF SYRACUSE.

24. Upon information and belief, the ROMAN CATHOLIC DIOCESE OF SYRACUSE and FRANCIS JAMES HARRISON had a duty to protect PLAINTIFF as a minor parishioner from JOHN FRANCIS HARROLD'S destructive sexual criminal acts.

25. Upon information and belief, the ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH failed to adequately and competently supervise JOHN FRANCIS HARROLD and as a proximate result of this failure and negligence, caused PLAINTIFF to be sexually abused by JOHN FRANCIS HARROLD.

26. That the aforementioned occurrences of sexual abuse were caused by the negligence, carelessness and recklessness and the willful, wanton, reckless and grossly negligent conduct of FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH

CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and the ROMAN CATHOLIC DIOCESE OF SYRACUSE and their agents, servants and/or employees, in failing to properly and adequately supervise the conduct of JOHN FRANCIS HARROLD as it related to PLAINTIFF.

27. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to his nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and that PLAINTIFF will as a result become obligated to expend sums of money for medical expenses for treatment of said maladies.

28. That by reason of the foregoing, the ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, are also liable to PLAINTIFF for punitive and exemplary damages.

29. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(7).

30. That the amount of damages sought exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

AS AND FOR A SECOND CAUSE OF ACTION
(NEGLIGENT FAILURE TO WARN)

31. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in those paragraphs of this complaint marked 1 through 27 inclusive, with the same force and effect as if fully set forth at length herein.

32. Upon information and belief, prior to and at all times herein mentioned, FRANCIS JAMES HARRISON, the ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and their agents, servants and employees knew or should have known that JOHN FRANCIS HARROLD violated ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH rules, regulations and protocols prohibiting adult parish employees from being alone with minor parishioners on parish property.

33. The ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH had a duty to warn PLAINTIFF as a parishioner that JOHN FRANCIS HARROLD's violation of ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH rules, regulations and protocols concerning the prevention of sexual abuse of minors in the ROMAN CATHOLIC DIOCESE OF SYRACUSE'S parishes put him at risk for being sexually abused by JOHN FRANCIS HARROLD.

34. The ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and their agents, servants and employees were negligent, careless and reckless and acted willfully, wantonly and grossly negligent in failing to warn PLAINTIFF that the failure of JOHN FRANCIS HARROLD to abide by ROMAN CATHOLIC DIOCESE OF SYRACUSE, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH rules, regulations and protocols regarding prohibitions on employees being alone with minor parishioners put PLAINTIFF at risk for being sexually abused by VILLAFANE.

35. By reason of the foregoing, PLAINTIFF, sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, fright, anxiety, family turmoil, a severe shock to his nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and PLAINTIFF, will become obligated to expend sums of money for medical expenses for treatment of these maladies.

36. That by reason of the foregoing, the ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH are also liable to PLAINTIFF for punitive and exemplary damages.

37. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(7) and 1602(11).

38. That the amount of damages sought exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

THIRD CAUSE OF ACTION

(NEGLIGENT FAILURE TO PROVIDE A SAFE AND SECURE ENVIRONMENT)

39. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in those paragraphs of this complaint marked 1 through 35 inclusive, with the same force and effect as if fully set forth at length herein.

40. THE ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and JOHN FRANCIS HARRISON assumed a duty to protect the safety and welfare of PLAINTIFF as more fully set forth above, when PLAINTIFF became a parishioner at ST. PETER ROMAN CATHOLIC PARISH CHURCH and/or ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH and received therapy from JOHN FRANCIS HARROLD under the auspices of ST. PETER ROMAN CATHOLIC PARISH CHURCH and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH. This duty imposed upon said DEFENDANTS the duty to provide a reasonably safe and secure environment for PLAINTIFF while he was participating in parish programs such as the counseling with JOHN FRANCIS

HARROLD.

41. When PLAINTIFF was in said Defendants' care, said Defendants failed to exercise the degree of care that a reasonably prudent person would have exercised under similar circumstances.

42. The ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH, and their agents, servants and employees were negligent, careless and reckless and acted willfully, wantonly and grossly negligent in failing to provide a safe and secure environment for PLAINTIFF while he participated as a minor in the parishes and in counseling with parish priest JOHN FRANCIS HARROLD and as a result PLAINTIFF was sexually abused by JOHN FRANCIS HARROLD.

43. By reason of the foregoing, PLAINTIFF, sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, fright, anxiety, family turmoil, a severe shock to his nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and, upon information and belief, some or all of these injuries are of a permanent and lasting nature; and PLAINTIFF, will become obligated to expend sums of money for medical expenses for treatment of these maladies.


44. That by reason of the foregoing, the ROMAN CATHOLIC DIOCESE OF SYRACUSE, FRANCIS JAMES HARRISON, ST. PETER ROMAN CATHOLIC PARISH CHURCH, and ST. MARY OF THE ASSUMPTION ROMAN CATHOLIC PARISH CHURCH are also liable to PLAINTIFF for punitive and exemplary damages.

45. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(7) and 1602(11).

46. That the amount of damages sought exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

WHEREFORE, the plaintiff demands judgment against the defendants, together with compensatory and punitive damages, and the interest, costs and disbursements pursuant to the causes of action herein.

Dated: New York, New York
October 14, 2019



MICHAEL G. DOWD
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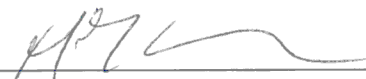
VERIFICATION BY ATTORNEY

MICHAEL G. DOWD, an attorney being duly admitted before the courts of the State of New York, hereby affirms the following under penalties of perjury:

That he is an attorney for the Plaintiff in the above-entitled action with offices located at 600 Third Ave, New York, New York; that he has read the foregoing VERIFIED COMPLAINT and knows the contents thereof; that the same is true to his knowledge, except as to the matters stated to be alleged upon information and belief, and that as to those matters he believes them to be true.

That the reason why this verification is made by deponent instead of Plaintiff is because Plaintiff is not within the County of New York where deponent has his office. Deponent further says that the grounds of his belief as to all matters in the VERIFIED COMPLAINT not stated to be upon his knowledge are based upon conversations with the Plaintiff and other writings relevant to this action.

Dated: New York, New York
October 14, 2019



MICHAEL G. DOWD
Attorney for Plaintiff
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